IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA)
Plaintiff,)
)
)
v.) Case No.: 2:19-cr-00013
)
GEORGIANNA A.M. GIAMPIETRO) Chief Judge Waverly D. Crenshaw, Jr.
Defendant.) Chief Judge Waverly D. Crensnaw, Jr.
DCICHUAHI.	,

MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

COMES NOW, Defendant, Georgianna Giampietro, by and through undersigned counsel and requests of the Court to allow the filing of Defense's Reply to the Government's Response to the Defense's Motion for the Production of a Witness, **Under Seal**. In support thereof, the Defense states as follows:

- 1. The Defense does not believe there is any information in the referenced Reply which is classified. However, the Reply may contain factual information that was provided to the defense pursuant to this Court's Protective Orders.
- 2. The Protective Orders do not direct that motions relying factual information provided pursuant to the Protective Orders be filed Under Seal. In the past the parties have utilized facts in their briefing that are subject to the Protective Orders.
- 3. With respect to the requested witness, however, the Government has expressed its preference that filings regarding the named witness in the Motion be made Under Seal.
- 4. In accordance with this preference, the Defense therefore seeks permission to file the Reply Under Seal.

5. The Court previously directed that the original Motion (D.E. 217) and the Response (D.E. 260) be filed Under Seal.

Respectfully submitted this 1st day of September, 2021.

/s/ Charles D. Swift
CHARLES D. SWIFT
Pro Hac Attorney for Giampietro
Constitutional Law Center for Muslims in America
100 N. Central Expy., Suite 1010
Richardson, TX 75080

Phone: (972)-914-2507 Email: cswift@clcma.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of September, 2021, I electronically filed the foregoing with the Clerk of the Court, Under Seal, and sent copies of said filing to all counsel of record.

/s/ Charles D. Swift
CHARLES D. SWIFT
Pro Hac Attorney for Georgianna Giampietro